IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

SAW CREEK AND PINE RIDGE INDIAN COMMUNITIES TRIBAL COUNCIL, Plaintiff,

CIVIL ACTION NO. 21-CV-03723

v.

RAYMOND TONKIN, et. al., Defendants.

AFFIDAVIT OF GERARD J. GEIGER

- I, Gerard J. Geiger, Esquire, duly sworn according to law, depose and say:
- 1. I am an attorney in good standing admitted to practice in:
 - a. the Supreme Court of the United States;
 - b. the Supreme Court of Pennsylvania;
 - c. the United States District Court for the Eastern District of Pennsylvania;
 - d. the United States District Court for the Middle District of Pennsylvania; and
 - e. the Court of Appeals for the Third Circuit.
- 2. I am also admitted pro hac vice in:
 - a. the United States District Court for the District of New Jersey in a case filed in that court to docket number 17-05154.
 - b. the United States District Court for the Southern District of New York in a case filed in that court to docket number 19-cv-6671.
- 3. I am not generally admitted to practice in the State of New York or the United States

 District Court for the Southern District of New York.

4. My office address, telephone number, fax number and email addresses are:

NEWMAN | WILLIAMS 712 Monroe Street, Stroudsburg, PA 18360 (570) 421-9090 (570) 424-9739 fax ggeiger@newmanwilliams.com

- 5. Pike County, through its insurance carrier, has requested my representation of Pike County District Attorney Raymond Tonkin and Pike County Correctional Facility Warden Craig Lowe, who are defendants in this matter.
- 6. I am not currently the subject of any pending disciplinary proceedings in any jurisdiction nor have I been disciplined previously in any jurisdiction.
 - 7. I have never been charged with any crime, or convicted of a felony.
- 8. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
- 9. There is good cause for my admission *pro hace vice* in that the listed defendants have requested my representation in this matter and I have represented the interests of Pike County and its employees and agencies since 2005 (16 years).
- 10. I am highly experienced in defending 42 U.S.C. §1983 matters, have lectured on issues involving §1983 cases, and have represented County governments and their employees throughout eastern and central Pennsylvania.
- 11. If admitted pro hac vice for this case, I agree to register for an SDNY Pacer Account, pay all required filing fees, subject myself to the disciplinary rules of this court, and handle this matter in accordance with all local rules.

Gerard J. Geiger, Esqui

Commonwealth of Pennsylvania County of Monroe

Subscribed and sworn to before me the undersigned Notary Public on

the 2 day of June, 2021

HPRIL 30, 3025
My commission expires:

Commonwealth Of Pennsylvania - Notary Seal Dolene Rodriguez, Notary Public Monroe County My Commission Expires April 20, 2025 Commission Number 1385989